

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF DOCUMENTS**

TO THE HONORABLE COURT:

PLEASE TAKE NOTICE that pursuant to Rule 83D(a) of the Local Civil Rules of the United States District Court for the District of Puerto Rico, Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to these proceedings by Section 310 of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), 48 U.S.C. § 2170 *et seq.*, and Sections 102(1) and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), made applicable to these proceedings by Section 301 of PROMESA, Goodwin Procter LLP and Morell, Cartagena & Dapena LLC hereby enter

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Case No. 17 BK 4780- LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

their appearance in the above-captioned Title III cases (the “Title III Case”) as co-counsel to Goldman Sachs & Co. LLC (“Goldman”). Goldman hereby requests, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, that all notice given or required to be given in these cases be served upon the undersigned counsel:

Brian E. Pastuszewski (*pro hac vice pending*)
Charles A. Brown (*pro hac vice pending*)
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
Tel.: 212.813.8800
Fax.: 212.355.3333
Email: bpastuszewski@goodwinlaw.com
cbrown@goodwinlaw.com

Iván Lladó
USDC PR No. 302002
**MORELL, CARTAGENA &
DAPENA LLC**
PO Box 13399
San Juan, PR 00908
Tel.: 787.723.1233
Fax.: 787.723.8763
Email: ivan.llado@mbcdlaw.com

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. §1109(b), the foregoing request includes not only the notices and papers referred to in PROMESA, the Bankruptcy Code, and the Bankruptcy Rules, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery, facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects any of the above-captioned debtors and debtors in possession (the “Debtors”) or the property of or in the possession, custody or control of any of the Debtors or which is otherwise filed or given with regard to the above-referenced Title III Case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to trial by jury in any proceeding so triable in the Title III Case or any case, controversy, or proceeding related to the Title III Case; and (2) to any other rights, claims, actions, defenses, setoffs, recoupments, or remedies to which Goldman (or

any of its affiliates) is or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, recoupments and remedies are expressly reserved.²

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

April 23, 2019

Respectfully submitted,

Goldman Sachs & Co. LLC

Brian E. Pastuszewski (*pro hac vice pending*)
Charles A. Brown (*pro hac vice pending*)

GOODWIN PROCTER LLP

The New York Times Building

620 Eighth Avenue

New York, New York 10018

Tel.: 212.813.8800

Fax.: 212.355.3333

E-mail: bpastuszewski@goodwinlaw.com

cbrown@goodwinlaw.com

/s/ Iván Lladó

Iván Lladó

USDC PR No. 302002

MORELL, CARTAGENA &

DAPENA LLC

PO Box 13399

San Juan, PR 00908

Tel.: 787.723.1233

Fax.: 787.723.8763

Email: ivan.llado@mbcdlaw.com

Co-Counsel to Goldman Sachs & Co. LLC

² Nor shall this request be deemed or construed to be a consent by Goldman or any of its affiliates as a waiver of any right to have final orders in non-core matters entered only after de novo review by a district judge, to the extent applicable to the Title III Case.